

# Milbank

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March 26, 2021

**VIA ECF**

Hon. Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

RE: *Yang v. Trust for Advised Portfolios et al.*, 1:21-cv-01047-FB-RLM

Dear Judge Mann:

We represent Infinity Q Capital Management, LLC and Leonard Potter in the above-captioned action and write pursuant to Your Honor's Individual Rules to respectfully request a stay of time to answer, move against, or otherwise respond to any complaint in this action, as detailed in the enclosed Stipulation and [Proposed] Order Regarding Time to Respond to Complaint. This is the first request for such relief and Plaintiff consents to the request.<sup>1</sup>

Respectfully Submitted,

/s/ Sean M. Murphy

Sean M. Murphy

cc: All counsel of record (via ECF)

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<sup>1</sup> This proposed stipulation was previously filed with Judge Block, and on March 25 the Court denied the motion "without prejudice to re-file their application addressed to MJ Mann who will be handling all pre-trial matters in this litigation." (Electronic Order, Mar. 25, 2021).

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